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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:22-cr-00144-IM-1

Plaintiff,

DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE

v.

MARIO CAMARENA-ZAMORA,

Defendant.

I, Conor Huseby, being duly sworn, hereby depose and say:

1. I represent the defendant, Mario Camarena-Zamora, in the above-captioned case.
2. Mr. Camarena-Zamora is charged with one count of Illegal Reentry in violation of 8 U.S.C. § 1326. Mr. Camarena-Zamora is in custody.
3. Trial in this matter is currently set for Tuesday, April 1, 2025. This is the fifth trial setting and the fifth motion to continue the trial date in this case, though it is the first motion filed since current defense counsel began representing Mr. Camarena-Zamora.
4. Additional time is needed because current defense counsel was not appointed to represent Mr. Camarena-Zamora until June 21, 2023. At that point, as reflected in pretrial reports, a warrant had issued for Mr. Camarena-Zamora's arrest for absconding from supervision, and

current defense counsel did not meet Mr. Camarena-Zamora until January 27, 2025. Since that day, defense counsel has met with Mr. Camarena-Zamora, begun analyzing the discovery in his case, and begun plea negotiations with the government. Additional time is needed to allow for a negotiated resolution of the case, or if resolution cannot be reached, to file pretrial motions, subpoena witnesses, and otherwise adequately prepare for trial.

5. Denial of a continuance would deny the defense the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(A).

6. The government, through Assistant United States Attorney Thomas Ratcliffe, has no objection to this motion.

7. I have explained Mr. Camarena's speedy trial rights to him. Mr. Camarena-Zamora waives his rights under the Speedy Trial Act for purposes of a continuance of the current trial date for approximately 90 days and agrees this continuance constitutes excludable delay pursuant to 18 U.S.C. § 3161(h)(7)(A).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 5th day of March 2025.

/s/ Conor Huseby
Conor Huseby, OSB #06373